

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his
official capacity as Chair of the House Standing
Committee on Redistricting, et al.,

Defendants.

Civil Action No. 23 CV 1057

NORTH CAROLINA STATE CONFERENCE OF
THE NAACP, et al.,

Plaintiffs,

v.

PHILIP BERGER, in his official capacity as the
President Pro Tempore of the North Carolina
Senate, et al.,

Defendants.

Civil Action No. 23 CV 1104

SECOND DECLARATION OF HILARY HARRIS KLEIN

I, Hilary Harris Klein, declare as follows:

1. I am more than 18 years of age, am of sound mind, and am otherwise competent to give this Declaration.

2. I am counsel for the North Carolina NAACP, Common Cause, Mitzi Reynolds Turner, Dawn Daly-Mack, Hollis Briggs, Corine Mack, Calvin Jones, Linda Sutton, and Syene Jasmin (“NAACP Plaintiffs”) in the above-captioned action.

3. This declaration is based on my personal knowledge and/or my review of correspondence and documents produced in this case.

4. I provided an initial Declaration in support of NAACP Plaintiffs’ Motion for a Protective Order, also dated October 4, 2024.

5. At the time I drafted the content of that Declaration, I had not yet received Legislative Defendants’ 30(b)(6) Notices of Depositions. Accordingly, I stated I had not received any such notices in paragraph 29 of that Declaration.

6. While I was finalizing the Motion for a Protective Order and its accompanying materials, including the declaration exhibits, Legislative Defendants did transmit (at 3:38pm) two 30(b)(6) Notices of Deposition. That updated email is reflected as Exhibit E to my prior declaration, but when the exhibit E document was updated I erred in not also updating my initial Declaration as well.

7. Accordingly, I submit this Second Declaration to confirm to the Court that, at 3:38pm this afternoon, I did receive two Notices of Deposition for Plaintiffs Common Cause and the North Carolina NAACP. I apologize for any confusion my first Declaration may have caused to the Court.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on October 4, 2024.

/s/ Hilary Harris Klein
Hilary Harris Klein

CERTIFICATE OF SERVICE

I certify that on October 4, 2024, I electronically filed the foregoing and its exhibits with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Hilary Harris Klein
Hilary Harris Klein